

EXHIBIT I

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re ANADARKO PETROLEUM
CORPORATION SECURITIES
LITIGATION

§ Civil Action No. 4:20-cv-00576
§
§ CLASS ACTION
§
The Honorable Charles R. Eskridge III

**AFFIDAVIT OF LYNDON PITTINGER IN SUPPORT OF PLAINTIFFS'
MOTION TO EXCLUDE CERTAIN TESTIMONY BY DEFENDANTS'
PROPOSED EXPERT DR. ROCCO DETOMO**

I, LYNDON PITTINGER, declare as follows:

1. I created the table in Figure 1 of the above-captioned case and motion to exclude.

2. The table uses the formulas listed below to generate mean values, and labels them accordingly.

(a) The MMRA mean is the arithmetic mean from tens of thousands of Monte Carlo simulation iterations performed using MMRA software by APC (Exhibit 69 in Pittinger Expert Report).

(b) The Swanson's mean was based on the following formula:

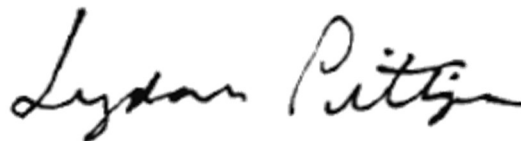
$$0.3*P90 + 0.4*P50 + 0.3*P10 == \text{Swanson's Mean}$$

(c) Detomo described his method for calculating expected value, which is equivalent to the risked mean, in his deposition (page 91:22-92:3), which I have interpreted to be the following formula:

$$0.9*P90 + 0.5*P50 + 0.1*P10 = \text{mean}$$

3. The mean values generated for each are accurate to the best of my knowledge and ability.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 16, 2023, at Amissville, Virginia.



LYNDON PITTINGER

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing on all counsel of record who have appeared in this matter via the Court's CM/ECF system on this, the 16th day of March, 2023.

s/ Joe Kendall

JOE KENDALL